

RACHEL K. ROBERTS  
U.S. Department of Justice  
Environment & Natural Resources Division  
7600 Sand Point Way NE  
Seattle, WA 98115  
Telephone: (206) 526-6881  
Facsimile: (206) 526-6665  
Email: rachel.roberts@usdoj.gov

Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

STATE OF ALASKA,

Plaintiff,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendant.

CASE NO. 3:17-cv-00090-HRH

**UNITED STATES' QUIET TITLE ACT (28  
U.S.C. § 2409a(e)) DISCLAIMER**

COMES NOW the United States of America, through undersigned counsel, and, pursuant to 28 U.S.C. § 2409a(e), disclaims all interest adverse to the Plaintiff, State of Alaska, in the submerged lands of the Knik River, “up to and including the ordinary high water lines of the right and left banks of the Knik River from its origination at the outlet of the unnamed pro-glacial lake within Section 8, T. 15 N., R. 5 E., Seward Meridian, downstream to where it enters T. 16, N., R. 3 E., Seward Meridian, except for those portions of the river that traverse state-owned uplands . . . .” *See* ECF No. 1 at ¶ 16 (description of the “disputed portion of the Knik River” in the State of Alaska’s Complaint).

Dated: September 5, 2017      Respectfully Submitted,

JEFFREY H. WOOD  
Acting Assistant Attorney General  
U.S. Department of Justice  
Environment & Natural Resources Division

/s/ Rachel K. Roberts  
RACHEL K. ROBERTS  
Trial Attorney  
U.S. Department of Justice  
Environment & Natural Resources Division  
7600 Sand Point Way NE  
c/o DOJ/DARC  
Seattle, WA 98115  
Telephone: (206) 526-6881  
Facsimile: (206) 526-6665  
Email: rachel.roberts@usdoj.gov

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 5, 2017, a copy of the foregoing Notice of Appearance was served electronically via the court's ECF system on the following:

Jessica Moats Alloway

Ashley C. Brown

/s/ Rachel K. Roberts  
RACHEL K. ROBERTS